

1 **RICHARD I. DREITZER, ESQ.**

Nevada Bar No. 6626

2 **DAVID S. KAHN, ESQ.**

Nevada Bar No. 7038

3 **JAMES T. TUCKER, ESQ.**

Nevada Bar No. 12507

4 **WILSON, ELSER, MOSKOWITZ, EDELMAN & DICKER LLP**

300 South Fourth Street, Eleventh Floor

5 Las Vegas, Nevada 89101

Tel: 702.727.1400/Fax: 702.727.1401

6 Richard.Dreitzer@wilsonelser.com

David.Kahn@wilsonelser.com

7 James.Tucker@wilsonelser.com

8 *Attorneys for Defendant The State of Nevada, ex rel.*
9 *its Department of Corrections*

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 DONALD WALDEN JR, NATHAN
13 ECHEVERRIA, AARON DICUS, BRENT
14 EVERIST, TRAVIS ZUFELT, TIMOTHY
15 RIDENOUR, and DANIEL TRACY on behalf
16 of themselves and all others similarly situated,

17 Plaintiffs,

18 vs.

19 THE STATE OF NEVADA, EX REL. ITS
20 NEVADA DEPARTMENT OF
21 CORRECTIONS, and DOES 1-50,

22 Defendant.

Case No.: 3:14-cv-00320-MMD-WGC

**STIPULATION FOR ENLARGEMENT OF
TIME TO FILE RESPONSIVE
PLEADINGS AND ORDER
(First Request)**

23 Defendant State of Nevada, ex rel. its Department of Corrections (“NDOC”), and Plaintiffs,
24 Donald Walden Jr., Nathan Echeverria, Aaron Dicus, Brent Everist, Travis Zufelt, Timothy
25 Ridenour, and Daniel Tracy, on behalf of themselves and all others allegedly similarly situated
26 (“Plaintiffs”) (collectively referred to as “the Parties”), by and through their respective counsel of
27 record, hereby stipulate and agree to extend the time for the Parties to file the following responsive
28 pleadings:

Currently, NDOC’s opposition to Plaintiffs’ Motion for Partial Summary Judgment is due on
February 21, 2018. The Parties have stipulated to allow NDOC additional time to file their
opposition up to and including February 28, 2018. The Parties have further stipulated that the

1 Plaintiffs' reply will be due on or before March 21, 2018. The Parties are requesting this extension
2 due to counsels' professional commitments and existing workload.

3 Additionally, the deadline for NDOC to file their opposition to Plaintiffs' Motion for Class
4 Certification is February 28, 2018. The Parties have stipulated to allow NDOC additional time to
5 file their opposition up to and including March 7, 2018. The Parties have further stipulated that the
6 Plaintiffs' reply will be due on or before March 28, 2018. The Parties are requesting this extension
7 due to counsels' professional commitments and existing workload.

8 Finally, the deadline for Plaintiffs to file their opposition to NDOC's Motion to Decertify the
9 Collective Action is February 28, 2018. The Parties have stipulated to allow Plaintiffs additional
10 time to file their opposition up to and including March 7, 2018. The Parties have further stipulated
11 that NDOC's reply will be due on or before March 28, 2018. The Parties are requesting this
12 extension due to counsels' professional commitments and existing workload.

13 Counsel certifies that this request is made in good faith and not for the purposes of delay.
14

15 ///

16 ///

17 ///

18 ///

19 ///

20 ///

21 ///

22 ///

23 ///

24 ///

25 ///

26 ///

27 ///

1 This is the first request for an extension of time to file the above-mentioned responsive
2 pleadings.

3 Dated this 21st day of February, 2018.

Dated this 21st day of February, 2018.

4 WILSON ELSE MOSKOWITZ EDELMAN
5 & DICKER LLP

THIERMAN BUCK LLP

6 */s/ Richard I. Dreitzer*

/s/ Richard I. Dreitzer

7 _____
8 Richard I. Dreitzer
9 Nevada Bar. No. 6626
10 300 South 4th Street - 11th Floor
11 Las Vegas, NV 89101-6014
12 *Attorneys for Defendants The State of Nevada,*
13 *ex rel. its Department of Corrections*

Mark R. Thierman
Nevada Bar No. 8285
Joshua D. Buck
Nevada Bar No. 12187
Leah L. Jones
Nevada Bar No. 13161
7287 Lakeside Drive
Reno, Nevada 89511
Attorneys for Plaintiffs

14 **ORDER**

15 **IT IS SO ORDERED.**

16 DATED this 22nd day of February, 2018.

17
18
19 

20 _____
21 UNITED STATES DISTRICT JUDGE
22
23
24
25
26
27
28